



110 Union Street, Suite 500
Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
Fax: 206.343.7522
www.pscleanair.org

Puget Sound Clean Air Agency Written Warning

Inspection Date: 5/30/02

No 2-000326

Time: 11:35 AM

Case/Registration No. <u>R# 11339</u>	Name <u>Ash Grove Cement Co</u>	Responsible Person, Title <u>Craig Gotro Plant Manager</u>	
Site Address <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

Regulations Violated:

Regulation I Section 9.15 unlawful to cause or allow fugitive emissions without using reasonable precautions to control the dust.

Violation Description:

I observed visible emissions as a back hoe operator transferred limestone from a barge to a hopper prior to the material ~~was~~ being placed onto the Ash Grove raw material conveyor. No dust control measures were in place. The violation occurred at 11:00 am.

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

☒ By within 10 days submit a written report describing the action you have taken to correct this violation and achieve compliance with agency regulations.

☐ By _____, you must: _____

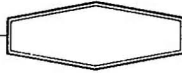
Issued By:

Received By:

Signing this is not an admission of guilt

Date/Time: 5/30/02 11:45 AM

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

June 6, 2002

Ms. Elizabeth Gilpin
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Written Warning 2-000326

Dear Ms. Gilpin:

The above document dated 5/30/02 requires a response to PSCAA within 10 day describing corrective actions.

Until the installation of the water spray system is complete, water will be applied by a hose as needed to aid in controlling the dust generated by material being loaded into the barge hopper. Although the completion deadline for the water spray system under AOD 9352 is September 21, 2002, it is anticipated the system will be in place and operational by July 1, 2002.

Please call me if I can be of further assistance.

Sincerely yours,

Gerald J. Brown
Manager, Safety and Environment

cc: C. Gotro
C. Miffllin
Prod. Dept staff

AGCS2M003681



Working Together For Clean Air

www.pscleanair.org

June 12, 2002

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

110 Union Street

Suite 500

Seattle, WA 98101-2038

R 11339

Mr. Craig Gotro
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

EXECUTIVE DIRECTOR

Dennis J. McLerran

Dear Mr. Gotro:

Disposition of Written Warnings No. 2-000326

BOARD OF DIRECTORS

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Cary Bozeman, Mayor

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John Ladenburg, Executive

TACOMA

Bill Baarsma, Mayor

SNOHOMISH COUNTY

Jeff Sax, Councilman

EVERETT

Edward D. Hansen, Mayor

MEMBER AT LARGE

Janet Chalupnik

Based on the information provided to us in your corrective action letter dated June 6, 2002, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4026.

Sincerely,

Elizabeth M. Gilpin
Inspector II

EMG:VJD

cc: Melissa McAfee
Fred L. Austin
Rosemary G. Busterna



Working Together For Clean Air

May 29, 2002

www.pscleanair.org

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

110 Union Street

Suite 500

Seattle, WA 98101-2038

R 11339

Henrik Voldbaek
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

Dear Mr. Voldbaek:

EXECUTIVE DIRECTOR

Dennis J. McLerran

BOARD OF DIRECTORS

CHAIR

Bill Evans

Tacoma City Councilman

KING COUNTY

Ron Sims, Executive

SEATTLE

Gregory J. Nickels, Mayor

KITSAP COUNTY

Jan Angel, Commissioner

BREMERTON

Cary Bozeman, Mayor

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John Ladenburg, Executive

TACOMA

Bill Baarsma, Mayor

SNOHOMISH COUNTY

Jeff Sax, Councilman

EVERETT

Edward D. Hansen, Mayor

MEMBER AT LARGE

Janet Chalupnik

Disposition of Written Warning 2-006606

Based on the information provided to us in your corrective action letter dated February 13, 2002, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. We concur that the violations of the 24 hr. NOx emission standard reported on the July 2001 CEM report occurred during startup. As a result they are excused from penalty pursuant to WAC 173-400-107.

Thank you for providing the 569.90 16 NOx/hr Supplemental Significance Threshold. A conversion of this number to ppm results in a SST value of 662 ppm with the raw mill off and 660 ppm NOx with the raw mill on. Therefore on all subsequent monthly CEM reports to this Agency, when 24 hr NOx values exceed the NOC 7381 condition 5(b) 650 ppm 24 hr. standard, please provide the lb. of NOx/hr equivalent for each hour over the standard. In addition, please state whether the raw mill was on or off for each hour during which Ash Grove exceeds the 650 ppm NOx standard.

If you have any questions concerning this matter, please contact me at 689-4026.

Sincerely,

Elizabeth M. Gilpin
Inspector II

EMG:VJD

cc: Rosemary G. Busterna, PSCAA



110 Union Street, Suite 500
Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
Fax: 206.343.7522
www.pscleanair.org

Puget Sound Clean Air Agency

Written Warning

RECEIVED

JUN 25 2002

Inspection Date: May 30 2002

No 2-006632

Time:

Case/Registration No.	Name		Responsible Person, Title	
Reg. # 11339	Ash Grove Cement Co.		Craig Gotro	
Site Address	City	Zip	County	
3801 E. Marginal Way So.	Seattle	98134	King	
Mailing Address	City, State	Zip	Phone	
As Above	Seattle	98134	(206) 623-5596	

Regulations Violated:

~~40 CFR 63.1345 (d) no owner or operator shall cause to be discharged to the atmosphere Dioxin/Furan emissions > 0.20 ng/dscm corrected to 7% O_2 when test run Average temps at the inlet to the particulate matter control device is $> 400^\circ F$~~
Violation Description: or 0.40 ng/dscm corrected to 7% O_2 when test run average temperatures to control device $\leq 400^\circ F$

~~40 CFR 63.1349 (b)(3) owner or operator shall demonstrate initial compliance with Dioxin/Furan standard by conducting a performance test using Method 23 of Appendix A in part 60 of this chapter~~

Violation Description: Kiln emissions to coal mill were not tested to demonstrate initial compliance. The EPA administrator has not approved any alternative methods.

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

☒ By Within 10 days of your receipt of this notice, submit a written report describing the action you have taken to correct this violation and achieve compliance with agency regulations.

☐ By _____, you must: _____

Issued By:

Clyde A. Giff

Received By:

Signing this is not an admission of guilt

Time:

6:21:02

7099 3220 0000 3078 8905

Certified Mail Number

70-121-1 (12/00) MAM

AGCS2M003684



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Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
Fax: 206.343.7522
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Puget Sound Clean Air Agency
Written Warning

RECEIVED
JUN 25 2002
AGCW - SEATTLE

Inspection Date: May 30, 2002
Nº 2-006631
Time: _____

Case/Registration No. <u>Reg # 11339</u>	Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Craig Gotro</u>	
Site Address <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

Regulations Violated:

Regulation I Section 3.07 (a) Testing of sources for compliance with emission standards shall be performed in accordance with current US EPA approved methods unless specific methods have been adopted by the board.

Violation Description: 40 CFR 63.7 (4)(3)(ii) (A) and (B)

(A) If the owner or operator intends to demonstrate compliance using the test method specified in the relevant standard, the owner or operator shall conduct the performance test using the specified method(s).

(B) The owner or operator shall apply to the administrator prior to the performance test for any alternative test methods.

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

☒ By Within 10 days ^{of your receipt of this notice}, submit a written report describing the action you have taken to correct this violation and achieve compliance with agency regulations.

☐ By _____, you must: _____

Issued By: *Cheryl A. Hilts* Received By: _____
Signing this is not an admission of guilt

Puget Sound Clean Air Agency

Written Warning No 2-006631

Source Name: Ash Grove Cement Co.Case No./Registration No.: Reg. 11339Violation Description:

Causing or allowing deviations to the US EPA Method 23 dioxin/furan source test without obtaining approval for an alternative method. The deviations to the test method were observed by this Agency on May 30th 2002.

40 CFR Part 60 Appendix A Method 23

Method 23 Deviations observed as follows:

2.1.2 Sample transfer lines shall be as short as possible and shall be heat traced at 120°C. The teflon transfer line from the hot box filter to the condenser was approximately 6 ft. in length. It was not heat traced. It was at ambient temperature.

4.1.3.5 Monitor temperature of the condenser and XAD trap and keep it below 20°C during the test. We observed no thermocouple to monitor temperature on either the condenser or the XAD.

4.2.3 Recover the sample line and glassware with three 5 minute soaks of methylene chloride. 4.2.4 Repeat the same procedure with toluene. We were informed that the source testers were rinsing the lines with solvent and not soaking them.

4.2.1 Seal the (dry) filter in the filter holder or in a container. We observed the filters in amber glass jars filled with solvent.

Issued By:



7099 3220 0000 3078 8905

Date/Time:

6-21-02

Violation No.:

WW # 2-006631



Seattle Plant

facsimile

TRANSMITTAL

to: Tracy Prevo
Valid Results
Fax: 206. 524-4710

re: PSCAA Written Warnings

date: Wednesday, June 26, 2002

Number of pages: Including cover: 4

The following PSCAA warning was received regarding the D/F testing recently conducted. Please help explain.

From the desk of ...

Gerald J. Brown, CSP
Manager Safety and Environmental
Ash Grove Cement Company
3801 E. Marginal Way So.
Seattle, WA 98134

(206) 694-6221
fax: (206) 623-5355

AGCS2M003687



Seattle Plant

facsimile

TRANSMITTAL

**to: Fran Streitman,
Bob Vantuyl**

Fax: OPK

re: PSCAA Written Warnings

date: Tuesday, June 25, 2002

Number of pages: Including cover: 6

The following PSCAA warnings were received regarding the D/F testing recently conducted..

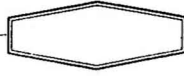
From the desk of ...

Gerald J. Brown, CSP
Manager Safety and Environmental
Ash Grove Cement Company
3801 E. Marginal Way So.
Seattle, WA 98134

(206) 694-6221
fax: (206) 623-5355

AGCS2M003688

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

July 28, 2002

Ms. Elisabeth Gilpin
Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Written Warning #
2-006631 and 2-006632

Dear Ms. Gilpin:

Because of the upcoming holiday and availability of key personnel, Ash Grove request an 10 day extension to in order to develop a proper response as instructed by the above.

Please call me if I can be of further assistance.

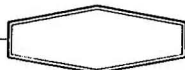
Sincerely yours,

Gerald J. Brown
Manager, Safety and Environment

cc: Craig Gotro
Bob Vantuyt.

AGCS2M003689

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

July 12, 2002

Ms. Elizabeth Gilpin
Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, WA 98101-2038

RE: Written Warning Nos. 2-006631, 2-006632

Dear Ms. Gilpin:

With reference to Written Warning No. 2-006631, enclosed please find a letter from Valid Results to serve as a response to the first referenced written warning. Hopefully this letter and the attached test results will address your concerns conveyed in correspondence received on June 25, 2002. The explanations should be self-explanatory. If you require additional information, please let us know. Ash Grove believes Valid's explanation of the minor deviation during the referenced tests clearly demonstrate that PSCAA should approve the test results. If PSCAA determines that the minor deviations from the test procedure are not acceptable, PSCAA should inform Ash Grove that PSCAA has not approved the performance test in order for Ash Grove to demonstrate compliance with the dioxin/furan standard within 180 days of June 14, 2002. PSCAA should not issue any further enforcement actions because Ash Grove conducted the performance test before the effective date of the rule.

With reference to Written Warning No. 2-006632, as per 40 CFR §63.7(a), Ash Grove must do performance testing within 180 days of the compliance date for such source which requires a demonstration of compliance by December 11, 2002. Ash Grove currently has on file an alternate monitoring request for the coal mill which I understand is under review by Mr. Alan Butler of your Agency. In any event, Ash Grove will take appropriate steps are necessary to comply with the dioxin/furan standard by the required date.

Should you require additional information, please contact me at the letterhead address.

Yours truly,

Gerald, J. Brown
Manager Safety and Environmental

CC: RVV-OPK

Attachment

AGCS2M003690



Source Level Air Emissions Testing

July 12, 2002

Mr. Gerald Brown
Safety and Environmental Manager
Ash Grove Cement Company
3801 East Marginal Way South
Seattle, WA 98134

PSCAA Written Warning:

Dear Mr. Brown:

Valid Results, Inc. (VR) issues this response to the written warning issued by the Puget Sound Clean Air Agency (PSCAA), Written Warning No. 2-006631, to the Ash Grove Cement Company, concerning the NESHAP Dioxins/Furans Compliance Testing, which occurred on May 29-30, 2002. We would like to clarify several points addressed in the warning letter.

Regulation I Section 3.07 (a) was not violated since EPA Method 23 was used, with a few minor modifications. As will be explained below, these minor modifications did not have any effect on the test results.

Some of the test modifications identified in the written warning did occur and some did not. These issues were discussed in a meeting held on-site, at the end of testing, with Melissa McAfee and Elizabeth Gilpin with PSCAA, Gerald Brown with the Ash Grove Cement Company and Tracy Prevo with Valid Results.

At that meeting VR asked if PSCAA believed the testing modifications would have an effect on the results. If PSCAA thought the minor modifications would have a significant effect on the results, VR would void the tests and re-test, prior to analyzing the samples. The decision made at that time, by PSCAA, was to go ahead with the analysis to see how the data looked. The written warning was issued prior to receipt of the analytical test results, which is contrary to our discussion on the matter.

The minor modifications that occurred, happened during testing and it was impractical to obtain written permission prior to scheduled testing. Any delays in the test schedule would involve significant financial burden to Ash Grove Cement. The minor modifications will be addressed in the final report as well as below.

VALID RESULTS, INC.

3030 N.E. 97TH STREET, SEATTLE, WA 98115-2446 * TEL (206) 522-5665 * FAX (206) 524-4710
AGCS2M003691

2.1.2

Due to an equipment malfunction, unheated thick-walled Teflon tubing was used to connect the outlet of the filter holder to the condenser so that any build-up of organic or particulate matter in the transfer line could be seen. The transfer line was kept as short as practically possible in order to allow the insertion and extraction of the sample probe without having to disassemble the sample train.

Testing performed at a similar facility has shown there to be no difference in test results between a heated and an unheated sample transfer line. A malfunction in the temperature controller during the final run caused the sample transfer line to be unheated. The results were almost identical between the heated and unheated samples.

4.1.3.5

The temperature of the condenser and XAD-2 resin trap were maintained below 68 degrees F, as demonstrated by the excellent surrogate recovery percentages. The five surrogate standards recoveries were from 94 to 98 percent. These were well above the minimum 70 percent recoveries, which would indicate problems with the XAD-2 resin. The laboratory recovery results are attached below.

The impinger bucket ice level and the operation of the water re-circulation pump were verified manually, at each five-minute sample point, throughout the test. The re-circulation water that exits the resin/condenser units is placed so that the testers can visually see the water flowing and physically touch it. This way the tester does not need to rely on the temperature sensor placed on the outside of the resin cartridge inlet.

4.2.3 & 4.2.4

All of the sample fractions were recovered as stated in the test method. Ms. Gilpin spoke to a technician who had not performed any of the sample recoveries. Ms. Gilpin did not witness any recoveries during the two test days and assumed the violation based on the one tester's comments. The test results show no significant difference in the analytical data, between any of the rinsed samples.

4.2.1

The filter was included in the Acetone and Methylene Chloride sample fraction at the recommendation of the laboratory, as all of the sample fractions are quantitatively combined, reduced in volume and then analyzed as a single sample. There is no provision in the method for maintaining the filter in a "dry" state.

Our goal is always to provide the most accurate test data possible. Based on the reasons given above, we believe that there was no violation of Regulation I Section 3.07(a).

Thank you for your consideration.

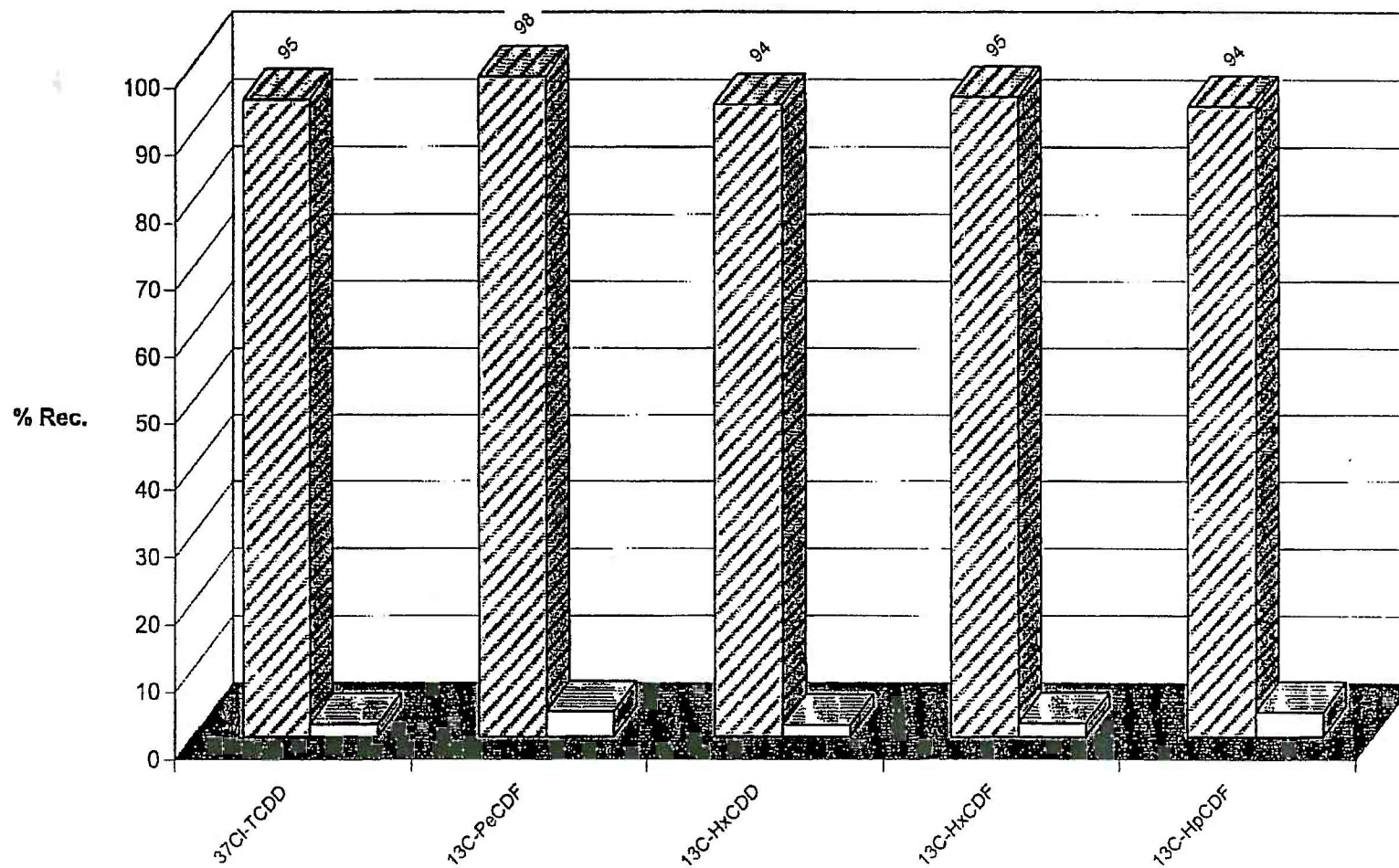
Sincerely,

A handwritten signature in black ink, appearing to read 'Tracy Prevo', written in a cursive style.

Tracy Prevo
Source Test Manager

Mean Recoveries of Sampling Standards (N=10)
Project ID: Ash Grove Cement - Seattle
P2131

▨ Mean □ Std. Dev.





www.pscleanair.org

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

110 Union Street

Suite 500

Seattle, WA 98101-2038

Working Together For Clean Air

Certified Mail No. 7000 0520 0021 4792 7491

August 31, 2002

Ash Grove Cement Company
c/o Craig Gotro, Plant Manager
3801 East Marginal Way S
Seattle, WA 98134

Re: Ash Grove Cement Company
May 29-30, 2002 Dioxin Furan Performance Test
and Coal Mill Testing: Written Warning Nos. 2-006631 and 2-006632

EXECUTIVE DIRECTOR

Dennis J. McLerran

Dear Mr. Gotro:

BOARD OF DIRECTORS

Thank you for submitting your Corrective Action letter dated July 12th, 2002, responding to the above-referenced Written Warnings.

TACOMA CITY COUNCIL, CHAIR

Bill Evans

As you know, the compliance date for the Portland Cement Manufacturing NESHAP (40 CFR 63, Subpart LLL) is June 10, 2002. Ash Grove has 180 days from June 10, 2002 to demonstrate compliance with those standards, pursuant to 40 CFR 63.7.

KING COUNTY

Ron Sims, Executive

SEATTLE

Gregory J. Nickels, Mayor

KITSAP COUNTY

Jan Angel, Commissioner

BREMERTON

Cary Bozeman, Mayor

PIERCE COUNTY

John Ladenburg, Executive

SNOHOMISH COUNTY

Jeff Sax, Councilman

EVERETT

Frank Anderson, Mayor

MEMBER AT LARGE

Janet Chalupnik

The Agency received your Source Test Plan dated 3/29/02. You stated that Valid Results would utilize US EPA's Method 23 to measure Dioxin / Furan during the source test. There were no requests for alternative source test methods or deviations from the methods in the Source Test Plan.

During our inspection of Ash Grove's facility on May 30th, 2002, the Agency observed the use of alternate procedures deviating from Method 23, which would have required prior approval by the Agency or EPA per 40 CFR 63.7(f). Agency inspectors Melissa McAfee and Elizabeth Gilpin raised concerns about these deviations during their review. The Agency documented the deviations from US EPA's Method 23 via Written Warning No. 2-006631 and deviations from 40CFR Part 63, Subpart LLL, via Written Warning No. 2-006632.

Your Corrective Action letter responding to the referenced Written Warnings failed to convince the Agency that, inspite of the deviations, the May 29-30th, 2002 Dioxin / Furan performance test was valid. Therefore, the Agency does not accept the performance test as valid.

As a result, the Agency recommends that you conduct a re-test. Please be sure to address the deviations we have documented in the re-test and describe the representative conditions that will exist during the test.

The test must be conducted within the 180 day period following June 10, 2002. in order to demonstrate compliance. The results must be submitted to this Agency within 60 days after the test is conducted.

Please re-submit the Source Test Plan indentifying the test methods to be used. Because of the time involved for Ash Grove to request deviations from the method in the test plan and the expected time to obtain EPA approval from EPA, the Agency requests that Ash Grove follow Method 23 in order to help produce the necessary compliance demonstration by the deadline.

Since the Source Test was not valid, the Agency has determined that the Continuous Temperature Limit has not been set.

Coal Mill Testing:

Ash Grove submitted letters to EPA dated October 22, 2002 and March 6, 2002 regarding an alternative testing method in order to meet the requirements of the Portland Cement NESHAPS. The response to that request will be sent shortly, but it is the determination of that review that testing of the coal mill is required and it should be included in the Source Test Plan for the re-test.

Please call me at (206) 689-4026, if you have any questions.

Sincerely,



Elizabeth Gilpin
Inspector

EMG/ml

cc: Laurie Halvorson, Agency Counsel
Mario Miller, Supervising Inspector
Rosemary Busterna, Compliance System Planner
Melissa McAfee, Inspector
Steven Van Slyke, Supervisory Engineer
Fred Austin, Engineer



Puget Sound Clean Air Agency ✓

110 Union Street, Suite 500

Seattle, WA 98101-2038

phone 206-343-8800/1-800-552-3565

fax 206-343-7522 www.pscleanair.org

Written Warning

No. 2-000481

Violation Date: July 30th 2002

Time:

Certified Mail No.: 7000 0520002/47927439

Case and/or Registration No. Reg. No. 11339	Name Ash Grove Cement Co.	Responsible Person, Title Craig Gotro, Plant Manager	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle, WA	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA.	Zip 98134	Phone (206) 623-5596

Violation of Regulation(s): 40 CFR Part 63.7(g)(1)

The owner or operator of an affected source shall report the results of the performance test to the Administrator before the close of business on the 60th day following the completion of the performance test, unless specified otherwise in a relevant standard or as approved otherwise in writing by the Administrator.

Regulation I Section 3.07 (C)

The owner or operator of any source required to perform a compliance test shall submit a report to the Agency no later than 60 days after the test.

Violation Description

On May 29th 2002 and May 30th 2002, Ash Grove Cement Company conducted a cement Neshap dioxin/furan source test. The results should have been submitted to this Agency on or before July 30th 2002. The test results have not been received by this Agency as of August 1st 2002.

Corrective Action Order

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

☒ By within 10 days of your receipt of this notice, submit ^{dioxin/furan source test results} a written report describing the action you have taken to correct this violation and achieve compliance with Agency regulations.

☐ By: , you must

Issued by:


Elizabeth Gilpin, Inspector, 206-689-4026

Date/Time: _____

Received by _____

signature

print name

Signing this document is not an admission of guilt

 8/15/02



Working Together For Clean Air

www.pscleanair.org

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

110 Union Street

Suite 500

Seattle, WA 98101-2038

September 4, 2002

Ash Grove Cement Company
c/o Craig Groto, Plant Manager
3801 E Marginal Way S
Seattle WA 98134

EXECUTIVE DIRECTOR

Dennis J. McLerran

BOARD OF DIRECTORS

TACOMA CITY COUNCIL, CHAIR

Bill Evans

KING COUNTY

Ron Sims, Executive

SEATTLE

Gregory J. Nickels, Mayor

KITSAP COUNTY

Jan Angel, Commissioner

BREMERTON

Cary Bozeman, Mayor

PIERCE COUNTY

John Ladenburg, Executive

SNOHOMISH COUNTY

Jeff Sax, Councilman

EVERETT

Frank Anderson, Mayor

MEMBER AT LARGE

Janet Chalupnik

Re: Ash Grove Cement Company (R11339)
Disposition of Written Warning No. 2-000481

Dear Mr. Gotro:

Based on the the submittal of your Dioxin / Furan Source Test results on August 16, 2002, this Agency considers the above-referenced matter closed as of this date and will take no further enforcement action in this case.

Thank you for your action to ensure compliance with Agency regulations and for joining with this Agency in efforts to achieve cleaner air.

Sincerely,

Elizabeth Gilpin
Inspector

EMG/ml

cc: Mario Miller, Supervising Inspector



Working Together For Clean Air

August 8, 2002

www.pscleanair.org

Ph 206.343.8800

1.800.552.3565

Fax 206.343.7522

110 Union Street

Suite 500

Seattle, WA 98101-2038

R 11339

Mr. Craig Gotro
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, Washington 98134

EXECUTIVE DIRECTOR

Dennis J. McLerran

BOARD OF DIRECTORS

TACOMA CITY COUNCIL, CHAIR

Bill Evans

KING COUNTY

Ron Sims, Executive

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Gregory J. Nickels, Mayor

KITSAP COUNTY

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BREMERTON

Cary Bozeman, Mayor

PIERCE COUNTY

John Ladenburg, Executive

SNOHOMISH COUNTY

Jeff Sax, Councilman

EVERETT

Frank Anderson, Mayor

MEMBER AT LARGE

Janet Chalupnik

Dear Mr. Gotro:

**Disposition of Notice of Violation Nos. 3-000302,
3-001656, 36679, 36715, 36716 and 36717**

During the preparation of the compliance history as part of your Air Operating Permit we discovered Notice of Violations (NOV) which did not have documentation of closure.

Our records show a closure letter was mailed on November 19, 1998 for NOV No. 36679. Also a closure letter was mailed on November 2, 1998 for NOV Nos. 36715, 36716 and 36717. These closure letters are missing from our files.

Notice of Violation Nos. 3-000302 and 3-001656 were not included in the Assurance of Discontinuance (AOD) for Civil Penalty No. 9352 dated March 25, 2002. The AOD, however, does address the substantive issues of these NOV's.

These cases are closed and no further enforcement action will be taken.

If you have any questions concerning this matter, please contact me at 689-4026.

Sincerely,

Elizabeth M. Gilpin
Inspector II

EMG:VJD

cc: Melissa McAfee
Fred L. Austin
Rosemary G. Busterna